

**IN THE UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CANDACE RAY	:	CIVIL ACTION NO. 02-CV-4382
	:	
v.	:	JURY TRIAL DEMANDED
	:	
ABINGTON TOWNSHIP, ET AL.	:	
	:	

PLAINTIFF'S COUNSEL'S MOTION TO WITHDRAW

The undersigned counsel Frost & Zeff and Gregg L. Zeff hereby move this Court for an Order withdrawing their appearance as counsel for Plaintiff and in support thereof state:

1. This is a civil rights action alleging that Plaintiff was assaulted and mistreated by various police officers.
2. A conflict has arisen between Plaintiff and Plaintiff's counsel related to the manner and method in which this case should proceed.
3. Attorney-Client Privilege prevents counsel from revealing further information regarding this conflict.
4. Counsel is available to discuss the matter in camera with the court at the court's pleasure.
5. Defendants have filed Summary Judgement to Motions.
6. On behalf of Plaintiff, an extension of deadlines to respond to these Motions as well as the December 1, 2003 trial pool are requested.

WHEREFORE, Frost & Zeff and Gregg L. Zeff request leave of court to withdraw as counsel for Plaintiff.

Respectfully submitted,

GREGG L. ZEFF

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MEMORANDUM OF LAW

Plaintiff is currently represented Frost & Zeff through Gregg L. Zeff. A conflict has arose between the Plaintiff and his attorney which prevents Plaintiff's attorney from continuing with the prosecution of this case. This conflict relates to the manner and method of how testimony and trial in this matter should proceed.

As a result, Plaintiff's counsel seeks an order for leave to withdraw as counsel.

Because of the sensitive nature of the conflict, Plaintiff's counsel would request, if necessary, that the actual conflict be discussed in camera with the court or the court's magistrate if necessary.

By this Motion, Plaintiff and Counsel on behalf of Plaintiff seek a stay of these proceedings to allow Plaintiff thirty (30) days to obtain new Counsel.

Respectfully submitted,

GREGG L. ZEFF

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ORDER

NOW this ____ day of _____, 2003 it is hereby Ordered and Decreed that Plaintiff's counsel Frost & Zeff and Gregg L. Zeff is permitted to and is hereby withdrawn from the above captioned matter.

Plaintiff shall have thirty (30) days to retain new counsel. This matter is Stayed for thirty (30) days pending entry of appearance of a new attorney for Plaintiff.

J.

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CERTIFICATE OF SERVICE

I, **GREGG L. ZEFF, ESQUIRE**, hereby certify that on November 6, 2003, a true and correct copy of Plaintiff's Counsel's Motion to Withdraw was forwarded to below-listed individuals via U.S. First Class Mail, postage-paid.

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GREGG L. ZEFF, ESQUIRE
Attorney for Plaintiff